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Attorneys for Defendant and Counterclaimant
JF MICROTECHNOLOGY SDN BHD

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

JOHNSTECH INTERNATIONAL CORP.,

Plaintiff,

vs.

JF MICROTECHNOLOGY SDN BHD,

Defendant.

AND RELATED COUNTER CLAIMS.

Case No. 3:14-cv-02864-JD

**DECLARATION OF
SHAWN G. HANSEN IN SUPPORT OF
JF MICROTECHNOLOGY'S
MOTIONS *IN LIMINE***

Date: June 15, 2016
Time: 3:00 pm
Dept: Courtroom 11, 19th Floor
Judge: Hon. James Donato

1 I, Shawn G. Hansen, declare as follows:

2 1. I am a partner at Nixon Peabody LLP, counsel of record in the above-captioned
3 action for Defendant and Counterclaimant JF Microtechnology SDN BHD (“JFM”). I am a
4 member in good standing of the State Bar of California and am admitted to practice before this
5 Court. I have knowledge of the facts set forth in this declaration based on my personal
6 involvement as lead counsel for JFM in this case and my review of the record. I could and would
7 competently testify to the same if called upon to do so.

8 2. Attached as Exhibit A is a true and correct copy of excerpts of Defendant JF
9 Microtechnology’s First Set of Interrogatories to Plaintiff served on December 4, 2014.

10 3. Attached as Exhibit B is a true and correct copy of excerpts of Defendant JF
11 Microtechnology’s First Set of Requests for Production to Plaintiff served on December 4, 2014.

12 4. Attached as Exhibit C is a true and correct copy of Plaintiff Johnstech International
13 Corp.’s Initial Disclosures Pursuant to Rule 26(a)(1) served on December 18, 2014.

14 5. Attached as Exhibit D is a true and correct copy of excerpts of Johnstech’s
15 Answers to Defendants’ First Set of Interrogatories (Nos. 1-10) served on January 5, 2015.

16 6. Attached as Exhibit E is a true and correct copy of excerpts of Johnstech’s
17 Responses to JF Microtechnology’s First Set of Requests for Production (Nos. 1-70) served on
18 January 5, 2015.

19 7. Attached as Exhibit F is a true and correct copy of excerpts of Johnstech’s First
20 Supplemental Answers to Defendants’ First Set of Interrogatories (Nos. 1-10) served on June 1,
21 2015.

22 8. Attached as Exhibit G is a true and correct copy of an email from Johnstech’s
23 counsel to JF Microtechnology’s counsel transmitting a production with the bates range
24 JOHNSTECH0007937 – 7982 served on November 2, 2015.

25 9. Attached as Exhibit H is a true and correct copy of excerpts of Johnstech’s Third
26 Supplemental Answers to Defendants’ First Set of Interrogatories (Nos. 1-10) served on
27 November 5, 2015.

28 10. Attached as Exhibit I is a true and correct copy of excerpts of the transcript of the

1 deposition of David Johnson taken on November 12, 2015.

2 11. Attached as Exhibit J is a true and correct copy of excerpts of the transcript of the
3 deposition of Dennis Wagner taken on November 13, 2015.

4 12. Attached as Exhibit K is a true and correct copy of excerpts of Johnstech's Expert
5 Report on Damages by John Beck, CPA, CPE, CMA including exhibits dated December 2, 2015.

6 13. Attached as Exhibit L is a true and correct copy of JF Microtechnology's Fourth
7 Set of Requests for Production of Documents to Plaintiff (Expert) served on December 16, 2015.

8 14. Attached as Exhibit M is a true and correct copy of Johnstech's Responses to JF
9 Microtechnology's Fourth Set of Requests for Production of Documents (Nos. 94-100) served on
10 January 19, 2016.

11 15. Attached as Exhibit N is a true and correct copy of Johnstech's Rebuttal Expert
12 Report of Michael Andres, dated December 23, 2015.

13 16. Attached as Exhibit O is a true and correct copy of excerpts of Johnstech's
14 Answers to Defendants' Second Set of Interrogatories (Nos. 11-14) served on June 10, 2015.

15 17. Attached as Exhibit P is a true and correct copy of excerpts of JFM's Expert
16 Report Regarding Invalidity by T. Kim Parnell, PH.D., PE including exhibits dated December 2,
17 2015.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed on May 18, 2016 at Palo Alto, California.

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21 /s/ Shawn G. Hansen

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